The RSPB has a number of priorities with regards to the Agriculture Bill, that it shares with likeminded organisations and coalitions that are advocating for policies that secure sustainable land management and deliver public value for public money. These priorities include:

- **Maintain the core principle of ‘public money for public goods’**.
  This is essential to the reforms set out by the UK Government, and to meeting a range of environmental and animal welfare commitments.

- **Secure legal safeguards on environmental, food safety and animal welfare standards** of imports, to ensure that farmers in the UK are not undercut by imported food produced to lower standards. This is not currently included in the bill.

- Build on the Conservative manifesto commitment to maintain funding, with **a long-term funding framework in the bill**, providing the certainty that farmers need to have confidence in these reforms. There is currently no long-term funding framework outlined in the bill.

- Funding commitments should be backed up by a duty on ministers to set budgets for the proposed **multi-annual financial assistance plans that reflect the scale of financial need** associated with the aims of the bill, related environmental targets, and needs of the climate and environment emergency.

- **Funding commitments and mechanisms should encompass the needs of devolved Governments**
i.e. there should be an assurance of adequate funds for Governments across the UK, to be used appropriately to help meet devolved policies and priorities.

- Introduce **powers to protect the environment and animal welfare and better regulate farming and land management**, building on our current baseline standards. **This is a major gap in the bill at present.**

- Ensure that all **spending on productivity measures contributes to the provision of public goods, securing win-wins for farming and the environment**, and contributing toward more sustainable, humane food production

- **Improve fairness in the supply chain**, by placing a duty on ministers to use the powers in the bill that would better regulate the relationship between farmers and the purchasers of agricultural products

The introduction of new duties to (a) have regard to food production in the exercise of the financial assistance purposes in clause 1 of the Bill, and (b) to provide a report to Parliament every five years relating to the food security of the United Kingdom are seen as broadly positive given the former specifically requires that:

"*In framing any financial assistance scheme, the Secretary of State must have regard to the need to encourage the production of food by producers in England and its production by them in an environmentally sustainable way.*"

This inclusion should (**still requires proper legal opinion**) address concerns around there being no requirement in the original bill to consider sustainability when supporting investments in productivity under clause 1(2).

We are comfortable with the inclusion of both new duties, however we believe that **any further movement in this direction is likely to compromise the core environmental principles of the Bill, and its potential effectiveness.**
There has been significant debate about food production in the context of the Agriculture Bill. The provision of public goods can and should go hand-in-hand with the production of healthy, sustainable food. A key element of the bill are the powers to improve the position of farmers in the supply chain and enable a better market return for the food and other marketable goods that they produce. It is essential that the Government use these powers, and the bill should place a duty on Ministers to do so.

With a fairer supply chain enabling a better return for marketable goods to farmers and growers, and public money for non-marketable public goods, the bill can be described as having at its heart a dual income strategy for the future of farming: a better income from the market for food and other products. And a stable and justifiable income from the public in return for the environmental and animal welfare benefits that society demands, but which the market does not reward.

In some cases, farmers will be rewarded for managing their land in ways that benefit the environment that may be unconnected to food production, such as large-scale tree planting to tackle the climate emergency. In other cases, public money will pay for changes to the way that farmers grow food that produce wider public benefits, such as the adoption of regenerative and agroecological farming methods that benefit biodiversity.

In the context of the latter, there is an increasing body of evidence that investing in our natural environment can yield real benefits for food production. A major study\(^2\) published in 2015 found that putting 8% of an arable farm into environmental measures, and managing these intensively for wildlife, led to a 25% increase in net yield for flowering crops (field beans), and no net loss of yield for wind pollinated crops (wheat and barley). This was due to the increase in pollinators and crop pest predators arising from the creation of habitats such as wildflower margins.

For hill farming, there are an increasing number of farmers within the industry who are taking a more extensive, nature-friendly approach to farming and land management in order to improve their

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\(^1\) The following applies equally to policy proposals for Wales.

profitability. A report recently commissioned by the RSPB, National Trust and The Wildlife Trusts³ makes the case that having fewer livestock often improves environmental outcomes, whilst also reducing variable and fixed costs. In a sector where agricultural activity is generally loss making, and farmers are price takers, reducing costs is known to be the best way of improving profitability and building financial resilience. This report demonstrates that nature-friendly hill farming, supported by public money for public goods, can not only deliver significant environmental benefits to society, but also improve the underlying profitability of the agricultural operation.

Changes to the Welsh schedule:

The removal of powers to provide financial assistance beyond modifying existing CAP schemes is welcomed⁴. The original proposal to retain powers (in Wales) to provide extensive financial assistance, including general financial assistance to farm, forestry and rural businesses, had the potential to undermine developing and future progressive land management policies (in Wales and across the UK) based on public goods and value for money.

We also view the introduction of a sunset clause of the end of 2024 for many of the provisions in the schedule as a positive as this creates the imperative for the Welsh Government to develop new policy.

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⁴ This statement is based on the understanding that payments beyond the CAP in Wales will be enabled via a Welsh Agriculture Bill.

RSPB Cymru, 28th February 2020